	COOLEMILE		
1	COOLEY LLP BOBBY GHAJAR (198719) (bghajar@cooley.com) COLETTE GHAZARIAN (322235)		
2			
3	(cghazarian@cooley.com) 1333 2nd Street, Suite 400		
4	Santa Monica, Ćalifornia 90401 Telephone: (310) 883-6400		
5	Facsimile: (310) 883-6500		
6	ANGELA L. DUNNING (212047)		
7	(adunning@cooley.com) MARK WEINSTEIN (193043)		
8	(mweinstein@cooley.com) JUDD LAUTER (290945)		
9	(jlauter@cooley.com) 3175 Hanover Street		
10	Palo Alto, CA 94304-1130 Telephone: (650) 843-5000		
11	Facsimile: (650) 849-7400		
12	LEX LUMINA PLLC MARK A. LEMLEY (155830)		
13	(mlemley@lex-lumina.com) 745 Fifth Avenue, Suite 500		
14	New York, NY 10151 Telephone: (646) 898-2055		
15	Facsimile: (646) 906-8657		
16	Counsel for Defendant Meta Platforms, Inc.		
17	UNITED STATES DISTRICT COURT		
18	NORTHERN DISTRICT OF CALIFORNIA		
19	_		
	RICHARD KADREY, an individual; SARAH SILVERMAN, an individual; CHRISTOPHER	Case No. 3:23-cv-03417-VC	
20	GOLDEN, an individual,	STIPULATION AND [PROPOSED] ORDER TO ENLARGE BRIEFING ON DEFENDANT'S	
21	Individual and Representative Plaintiffs,	MOTION TO DISMISS	
22	V.		
23	META PLATFORMS, INC., a Delaware corporation;	Trial Date: None Date Action Filed: July 7, 2023	
24	Defendant.	Date Heden I near vary 1, 2025	
25	Determant.		
26			
27			
28			

COOLEY LLP ATTORNEYS AT LAW Pursuant to Civil Local Rule 7-11 and Paragraph 35 of the Court's Standing Order, Plaintiffs Richard Kadrey, Sarah Silverman, and Christopher Golden (collectively, "Plaintiffs") and defendant Meta Platforms, Inc. ("Meta" or "Defendant") submit this Stipulation ("Stipulation") to enlarge the page limits for the Parties' briefs in connection with Defendant's forthcoming Motion to Dismiss the Complaint ("Motion to Dismiss"). Good cause exists to grant this Stipulation, as discussed below.

- 1. Plaintiffs filed the Complaint (Dkt. 1) in this action on July 7, 2023. The Complaint asserts six claims for (1) Direct Copyright Infringement (17 U.S.C. § 106), (2) Vicarious Copyright Infringement (17 U.S.C. § 106), (3) Removal of Copyright-Management Information and False Assertion of Copyright (17 U.S.C. §§ 1202(a), 1202(b)), (4) Unfair Competition (Cal. Bus. & Prof. Code §§ 17200 *et seq.*), (5) Unjust Enrichment (California common law), and (6) Negligence (California common law).
- 2. Meta intends to file a motion to dismiss under Fed. R. Civ. P. 12(b)(6) directed to all six claims in the Complaint.
- 3. Paragraph 35 of the Court's Standing Order provides that, "[u]nless expressly permitted by the Court, briefs in support of and in opposition to all substantive motions . . . may not exceed 15 pages, and reply briefs may not exceed 10 pages."
- 4. Meta seeks a modest enlargement of the page limits from 15 to 20 pages for Defendant's Motion to Dismiss and Plaintiffs' Opposition respectively (5 extra pages), and from 10 to 12.5 pages for Defendant's Reply (2.5 extra pages).
- 5. Meta believes that good cause exists for this request. Meta's Motion to Dismiss will address each of Plaintiffs' six claims. The arguments directed to each claim will involve discussion of distinct allegations and authorities, and Meta will undertake every effort to streamline them. However, Meta believes its ability to provide the Court with the arguments and authority necessary to appropriately resolve the Motion will be compromised by the default page limit.
- 6. The Parties have met and conferred, and Plaintiffs do not object to Meta's request for the enlargement of page limits.

## Case 3:23-cv-03417-VC Document 22 Filed 09/14/23 Page 3 of 4

1	7. For these reasons, the parties hereby stipulate to and request an order enlarging the	
2	page limits on the parties' briefs from 15 to 20 pages for Meta's Motion to Dismiss and Plaintiffs'	
3	Opposition, respectively, and from 10 to 12.5 pages for Meta's Reply.	
4		
5		Respectfully submitted,
6		
7	Dated: September 13, 2023	COOLEY LLP
8		
9		By: /s/ Angela L. Dunning Angela L. Dunning
10		Bobby Ghajar Mark Weinstein
11		Judd Lauter Colette Ghazarian
12		LEX LUMINA PLLC
13		Mark A. Lemley
14		Attorneys for Defendant META PLATFORMS, INC.
15		
16	Dated: September 13, 2023	JOSEPH SAVERI LAW FIRM, LLP
17		
18		By: _/s/ Joseph R. Saveri
19		Joseph R. Saveri Cadio Zirpoli
20		Christopher K.L. Young Kathleen J. McMahon
21		Matthew Butterick
22		Attorneys for Plaintiffs
23		RICHARD KADREY, SARAH SILVERMAN, and CHISTOPHER
24		GOLDEN
25		
26		
27		
28		
P		STIP, AND [Proposed] ORDER TO ENLARGE

COOLEY LLP ATTORNEYS AT LAW PALO ALTO

[PROPOSED] ORDER PURSUANT TO THE STIPULATION, IT IS SO ORDERED: The page limit for Defendant's forthcoming Motion to Dismiss and any Opposition 1. by Plaintiffs is 20 pages; and 2. The page limit for the Reply in support of Defendant's Motion is 12.5 pages. Dated: September 142023 HON. VINCE CHHABRIA UNITED STATES DISTRICT JUDGE 

COOLEY LLP
ATTORNEYS AT LAW
PALO ALTO